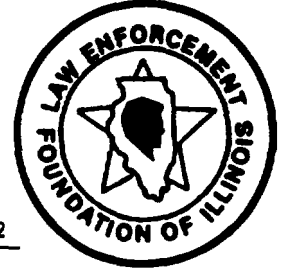




# Illinois Association of Chiefs of Police



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July 16, 1993

Office of the Secretary  
Federal Communication Commission  
1919 M Street, N.W.  
Washington, DC 20554

Ladies and Gentlemen:

On behalf of the Illinois Association of Chiefs of Police, I submit the following comments in my capacity of their elected president to the Federal Communication Commission's Notice of Proposed Rule Making entitled "Revision of Regulations on the Private Land Mobile Radio Services; Modification of Policies" published in the November 16, 1993 Federal Register.

The Communications Committee of our Association has reported to me the effort put forth by the commission in the development of the Proposed Rule Making presented for comment in the PR Docket No. Docket No. 92-235, Replacing Part 90 in Part 88 for Private Land Mobile Radio Services. This Notice of Proposed Rule Making addresses many of the concerns and needs of present and future two-way radio users, both public and private, in Illinois and the nation. The issues are so important that I must submit comments to the docket for the commission's consideration.

The two-way communications systems of many police departments in operation today would require significant changes if the proposed rules were to be implemented. While each police department has specific problems and concerns for the respective public service operations, the key concerns to the Communications Committee are:

1. The implementation schedule appears incomplete concerning the the proposed changes, specifically channel spacing and would require multiple replacement of radios far sooner than police departments would normally budget for replacement of this equipment. This would be very costly to all affected agencies and to the taxpayers of our jurisdictions. Fiscal impact on our departments could exceed \$300 million depending on final rule requirements. A one-step migration path is strongly suggested with conversion time frames suitable for the 12 to 15 year service life cycle of public agency radio systems, in addition to helping identify federal sources of funding to assist in the resolution of this ~~problem~~ situation.

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2. The implementation date of January 1, 1996, is too close for our police departments to plan, budget, and implement the system changes mandated by the proposed rules. We recommend January 1, 2000, as a more realistic target date for implementation.
3. The mandated reductions in tower height and transmitter power output will create a loss in wide area coverage in existing consolidated 911 Centers having large area coverage which will require substantial